

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

MARTIN RENEE WILLIAMS

CIVIL ACTION NO. 16-0216

VERSUS

VERMILION PARISH SHERIFF MAGISTRATE JUDGE HANNA

Proposed Voir Dire

Plaintiff, Martin R. Williams, through undersigned counsel, respectfully submits the following voir dire questions as it relates to the above captioned matter:

1. Does any member of the panel have any preconceived notions about this case or about the legal system that would prevent you from being fair to all parties in this case?
2. Does any member of the panel have any bias or prejudice that might prevent or hinder you from accepting the instructions of law that I will give you in this case?
3. Has any member of the panel read or heard anything about this case or about any of the issues involved in this case?
4. Does any member of the panel know Martin Williams or any members of Martin Williams' family, or had any dealings with her?
5. Has any member of the panel ever been employed by law enforcement? Does any member of the panel know of any family members or friends who have or are presently employed by law enforcement?

6. Has any member of the panel had any dealings, business or otherwise, with law enforcement?
7. Does any member of the panel know have a relative or close friend who has worked for or had dealings with law enforcement?
8. Has any member of the panel read anything about law enforcement or have knowledge about law enforcement that might affect your ability to sit on a jury in a case involving law enforcement?
9. Has any member of the panel worked in law enforcement?
10. Has any member of the panel ever been terminated on the basis of their race or gender?
11. Has any member of the panel know anyone who was treated more favorably than them on the job?
12. Has any member of the panel ever filed a lawsuit against law enforcement?
13. Has any member of the panel ever worked as a police officer?
14. Does any member of the panel have a relative or close friend who has or is presently working as police officer or law enforcement?
15. Has any member of the panel ever been involved in any way (as a participant or witness) in a case involving employment discrimination claims?
16. Has any member of the panel had any experiences in any lawsuit that would affect his or her ability to sit as a fair juror in a lawsuit?
17. Has any member of the panel read or see anything in the media, which has affected his or her opinion about the fairness of the jury system or the propriety of the size of jury verdicts?

18. Does any member of the panel have any feeling for or against parties who come to court and sue for money damages?

Martin R. Williams further respectfully requests the Court to make general inquiry of the panel concerning each member's:

- a. General place of residence;
- b. Familial status;
- c. Employment of spouse and adult children;
- d. Prior jury and/or grand jury service;
- e. Favorite television show;
- f. Regular newspaper.

Respectfully submitted by:

/s/ Harold D. Register, III

Harold D. Register, III (#35290)

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has on this 4th day of September, 2018 been sent to all known counsel of record via the CM/ECF filing system.

/s/ Harold D. Register, III

Harold D. Register, III